

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	Chapter 11
MOBILEUM, INC., <i>et al.</i> ,	§	Case No. 24-90414 (CML)
Debtors. ¹	§	(Joint Administration Requested)
	§	(Emergency Hearing Requested)
	§	

**AGENDA OF MATTERS SET FOR EMERGENCY
HEARING ON JULY 24, 2024 AT 10:00 A.M. (CENTRAL TIME)**

EMERGENCY RELIEF HAS BEEN REQUESTED. RELIEF IS REQUESTED NOT LATER THAN 10:00 A.M. (CENTRAL TIME) ON WEDNESDAY, JULY 24, 2024.

IF YOU OBJECT TO THE RELIEF REQUESTED OR YOU BELIEVE THAT EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU MUST APPEAR AT THE HEARING IF ONE IS SET, OR FILE A WRITTEN RESPONSE PRIOR TO THE DATE THAT RELIEF IS REQUESTED IN THE PRECEDING PARAGRAPH. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

A HEARING WILL BE CONDUCTED ON THIS MATTER ON JULY 24, 2024 AT 10:00 A.M. (CENTRAL TIME) IN COURTROOM 401, 4TH FLOOR, 515 RUSK AVENUE, HOUSTON, TX 77002.

PARTICIPATION AT THE HEARING WILL ONLY BE PERMITTED BY AN AUDIO AND VIDEO CONNECTION.

AUDIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT 832-917-1510. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE LOPEZ'S CONFERENCE ROOM NUMBER IS 590153. VIDEO COMMUNICATION WILL BE BY USE OF THE GOTOMEETING PLATFORM. CONNECT VIA THE FREE GOTOMEETING APPLICATION OR CLICK THE LINK ON JUDGE LOPEZ'S HOME PAGE. THE MEETING CODE IS "JUDGELOPEZ". CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING.

HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF BOTH ELECTRONIC AND IN-PERSON HEARINGS. TO MAKE YOUR APPEARANCE, CLICK THE "ELECTRONIC APPEARANCE" LINK ON JUDGE LOPEZ'S HOME PAGE. SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK "SUBMIT" TO COMPLETE YOUR APPEARANCE.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Mobileum, Inc. (7417); Matrix Intermediate, Inc. (7287); Matrix Holdco, LLC (0039); Matrix Parent, Inc. (9085); Mobile Acquisition Corp. (9591); SIGOS LLC (1763); UnwiredSoft, Inc. (2064); We

Mobileum, Inc. and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), hereby file this Agenda of Matters Set for Emergency Hearing on **July 24, 2024 at 10:00 a.m. (Central Time)** before the Honorable Christopher M. Lopez.

1. Request for Emergency Consideration of Certain “First Day” Matters (**Docket No. 28**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors’ Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors’ Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

2. Emergency Motion of Debtors Pursuant to Bankruptcy Rule 1015(b) and Bankruptcy Local Rule 1015-1 for Order Directing Joint Administration of Chapter 11 Cases (**Docket No. 2**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors’ Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors’ Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

3. Notice of Designation as Complex Cases (**Docket No. 3**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors’ Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors’ Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

Do Technologies Americas, Inc. (9338); Convene Networks LLC (2820); Developing Solutions Inc. (6177); and Phase 3 Innovations Holdings, Inc. (1899). The Debtors’ mailing address is 20813 Stevens Creek Boulevard, Suite 200, Cupertino, CA 95014.

4. Emergency Motion of Debtors for Entry of an Order (I) Scheduling combined Hearing on (A) Adequacy of Disclosure Statement and (B) Confirmation of Plan, (II) Approving Solicitation Procedures and Form and Manner of Notice of Commencement, Combined Hearing, and Objection Deadline, (III) Fixing Deadline to Object to Disclosure Statement and Plan, (IV) Approving Notice and Objection Procedures for Assumption of Executory Contracts and Unexpired Leases, (V) Conditionally (A) Directing the United States Trustee Not to Convene Section 341 Meeting of Creditors and (B) Waiving Requirement to File Statements of Financial Affairs and Schedules of Assets and Liabilities, and (VI) Granting Related Relief (**Docket No. 5**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)
- C. Joint Prepackaged Chapter 11 Plan of Mobileum, Inc. and its Affiliated Debtors (**Docket No. 14**)
- D. Disclosure Statement for Joint Prepacked Chapter 11 Plan of Mobileum, Inc. and its Affiliated Debtors (**Docket No. 16**)

5. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting (A) Liens and Providing Claims with Superpriority Administrative Expense Status and (B) Adequate Protection to Certain Prepetition Lenders, (III) Modifying Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (**Docket No. 18**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)
- C. Declaration of Bo Yi in Support of Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting (A) Liens and Providing Claims With Superpriority Administrative Expense Status and (B) Adequate Protection to Certain Prepetition Lenders, (III) Modifying Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (**Docket No. 19**)

6. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Existing Cash Management System, (B) Maintain Existing Business Forms and Intercompany Arrangements, (C) Continue Intercompany Transactions and (II) Granting Related Relief (**Docket No. 6**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

7. Emergency Motion of Debtors for an Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers; (II) Establishing Procedures for Resolving Objections by Utility Providers; (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief (**Docket No. 9**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

8. Emergency Motion of Debtors for an Order (I) Authorizing Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits, and Other Compensation, (B) Maintain Employee Benefits Programs and Pay Related Obligations, and (C) Pay Prepetition Employment Expenses and (II) Granting Related Relief (**Docket No. 15**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

9. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Critical Vendor Claims, (B) Non-U.S. Vendors, (C) Lien Claims, and (C) 503(b)(9) Claims, and (II) Granting Related Relief (**Docket No. 17**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

10. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Insurance Programs, (B) Pay All Obligations with Respect Thereto, and (C) Modify Automatic Stay to Permit Employees to Proceed with Workers' Compensation Claims and (II) Granting Related Relief (**Docket No. 8**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

11. Emergency Motion of Debtors for Entry of an Order (I) Authorizing Debtors to Continue and Honor Their Customer Programs and Otherwise Continue Their Customer Related Programs in the Ordinary Course of Business and (II) Granting Related Relief (**Docket No. 11**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

12. Emergency *Ex Parte* Application for Entry of an Order Authorizing Employment and Retention of Kroll Restructuring Administration LLC as Claims, Noticing, and Solicitation Agent (**Docket No. 13**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

- C. Declaration of Benjamin J. Steele in Support of Emergency *Ex Parte* Application for Entry of an Order Authorizing Employment and Retention of Kroll Restructuring Administration LLC as Claims, Noticing, and Solicitation Agent (**Docket No. 13-3**)
- 13. Emergency Motion of Debtors for an Order (I) Authorizing Debtors to Pay Certain Prepetition Taxes and (II) Granting Related Relief (**Docket No. 12**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)
- 14. Emergency Motion of Debtors for Order (I) Authorizing Debtors to (A) File a Consolidated Creditor Matrix and a Consolidated List of 30 Largest Unsecured Creditors and (B) Redact Certain Personal Identification Information and (II) Approving Form and Manner of Notifying Creditors of Commencement of Chapter 11 Cases and Other Information (**Docket No. 7**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)
- 15. Emergency Motion of Debtors for Entry of Order Enforcing Protections of 11 U.S.C. §§ 362, 365, 525, and 541 (**Docket No. 10**)

Status: This matter is going forward.

Related Documents:

- A. Declaration of Mike Salfity in Support of Debtors' Chapter 11 Petitions and First Day Relief (**Docket No. 4**)
- B. Debtors' Witness and Exhibit List for Emergency First Day Hearing on July 24, 2024 (**Docket No. 29**)

Dated: July 23, 2024
Houston, Texas

/s/ Gabriel A. Morgan
WEIL, GOTSHAL & MANGES LLP
Gabriel A. Morgan (24125891)
Clifford W. Carlson (24090024)
700 Louisiana Street, Suite 3700
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: Gabriel.Morgan@weil.com
Clifford.Carlson@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP
Jeffrey D. Saferstein (*pro hac vice* pending)
Alexander W. Welch (*pro hac vice* pending)
Daphne Papadatos (*pro hac vice* pending)
Eric L. Einhorn (*pro hac vice* pending)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: Jeffrey.Saferstein@weil.com
Alexander.Welch@weil.com
Daphne.Papadatos@weil.com
Eric.Einhorn@weil.com

*Proposed Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on July 23, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Gabriel A. Morgan
Gabriel A. Morgan